

REMARKS

Claims 1-29 and 31-34 are all the claims pending in the application. By this Amendment, Applicant amends claims 1, 14-15 and 28. No new matter is added. Reconsideration and allowance of claims 1-29 and 31-34 are respectfully requested in view of the following remarks.

I. Preliminary Matters

The Examiner did not acknowledge that the drawings filed on July 31, 2007 are accepted. Therefore, Applicants respectfully request the Examiner to check the appropriate box on the form PTO-326 indicating that the drawings are accepted.

II. Rejections Under 35 U.S.C. § 112, second paragraph

Claims 1-29 and 31-34 are rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. Applicants respectfully request the Examiner to withdraw this rejection in view of the self-explanatory claim amendments being made herein.

III. Objection to the Specification

The Examiner objects to the specification because the term "program code" was allegedly not defined in the specification as filed. Applicants amend claims 1, 14, 15 and 28 in order to overcome the objection and respectfully request that the objection to the specification be reconsidered and withdrawn.

IV. Rejections Under 35 U.S.C. § 103(a)

Claims 1-9, 13-23, and 27-29 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application No. 2003/0069848 to Larson et al. (hereinafter "Larson") in view of U.S. Patent No. 5,751,914 to Coley et al. (hereinafter "Coley"). Claims 10-12, 24-26, and 31-34

are rejected under 35 U.S.C. § 103(a) as being unpatentable over Larson and Coley and further in view of U.S. Patent No. 5,907,696 to Stilwell et al. (hereinafter "Stilwell").

Larson relates to a user interface for computer network management. Specifically, Larson discloses:

[an] application server 30 working in conjunction with an [network management system] NMS system. . . . a device experiencing a problem . . . **generates an SNMP trap** as a result of a negative event . . . The **NMS system monitors the computer network and detects events**. Depending on the event, the NMS will ignore it, log it, or generate an alert. . . . **the alert triggers a script to generate XML RPC**. The script is straightforward and **can be written in a variety of languages, e.g. PERL**. The XML contains pertinent attributes such as the device name, IP address, problem description, and alert ID number (emphasis added).

See page 12, [0129]. In other words, Larson's NMS system receives SNMP traps and generates XML RPC's using a script which can be written in a script language, e.g. PERL.

The Examiner acknowledges that Larson does not disclose or suggest: "a plurality of conversion rules, arranged in the form of scripts that are interpreted by the interpreter and are associated with a plurality of different primary event formats," as recited in claim 1 and similarly recited in claims 14, 15, and 28, but contends that Coley does. *See page 6 of the Office Action.*

Coley teaches: "[an] event converter 76 parsing each detected event into an internal event object, which comprises a uniform data structure that describes the detected event. For example, event converter 76 receives SNMP V1 and V2 traps, CMIP CMIS events, and RPC communications and maps each event type into a standard internal event object format." *See col. 8, lines 34-40.* In other words, Coley converts different primary formats into one internal standard format.

Coley is silent about the implementation of the event converter and merely discloses that such systems are generally implemented via object-oriented programming techniques. *See* col. 1, lines 20-23.

However, Larson in combination with Coley does not disclose or suggest: “wherein each of the plurality of different primary event formats corresponds to a particular script,” as recited in amended claims 1, 14, 15, and 28.

Larson does not differentiate between different primary event formats that correspond to different scripts because each alert merely triggers one single script. *See* page 12, [0129]. Coley converts each detected event into an internal event format by means of the event converter 76. Coley does not teach or suggest the event converter using different scripts corresponding to different events. In fact, in Coley the same routine is used for converting all types of events. Further, in Coley, after converting the events, “[e]vent converter 76 then passes the internal event object to rule processor 78.” *See* col. 8, lines 39-41. Even assuming, *arguendo*, that Coley’s rule processor 78 could be interpreted as comprising different rule sets for different event formats and that these different rules would correspond to scripts according to claims 1, 14, 15, and 28, Coley fails to teach that the plurality of conversion rules, arranged in form of scripts are arranged so as to convert, by means of said rules, primary data into secondary data which can be processed by said management device, as recited in claim 1 and similarly recited in claims 14, 15, and 28.

Instead, the conversion of the events into an internal event object, comprising a uniform data structure is performed by the event converter 76 before different rules of the rule processor are applied. *See* col. 8, lines 34-36.

Consequently, Larson in view or Coley do not teach or suggest all of the elements as set forth and arranged in claims 1, 14, 15, and 28. Stilwell does not remedy the deficiencies of Larson and Coley and claims 2-13, 16-27, 29 and 31-34 are thus patentable at least by virtue of their dependencies from claims 1, 15 and 28, respectively.

V. Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned attorney at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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Date: June 25, 2008